

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

CHARLENE CARTER,	§	
	§	
	§	
Plaintiff,	§	Civil Action No. 03:17-cv-02278-S
v.	§	
	§	
SOUTHWEST AIRLINES CO., AND	§	
TRANSPORT WORKERS UNION	§	
OF AMERICA LOCAL 556,	§	
	§	
Defendants.	§	

DECLARATION OF PAULO MCKEEBY

1. My name is Paulo McKeeby. I am over the age of 21, of sound mind, and capable of making this declaration. The facts stated herein are true and correct and are based on my personal knowledge.
2. I am a partner with law firm Reed Smith, LLP. I represent Southwest Airlines Co. (“Southwest”) in the above-styled lawsuit. I am familiar with the proceedings in this matter.
3. Attached hereto as Exhibit A is a true and correct copy of the biography of William Lemons. Exhibit A was collected from the following URL on September 1, 2021:
<https://whlemonsadr.com/about-mr-lemons/about-bill/>.
4. Attached hereto as Exhibit B is a true and correct copy of the resume of William Lemons. Exhibit B was collected from the following URL on September 1, 2021:
<https://whlemonsadr.com/about-mr-lemons/resume/>.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed in Dallas County, State of Texas, on the 1st day of September, 2021.

/s/ Paulo McKeeby

Paulo McKeeby

EXHIBIT A

William H. Lemons

After being shareholder and practice group leader in one of San Antonio's major law firms, I formed my professional corporation in 1997 hoping to become less involved in litigation, and more involved in dispute resolution – mediation, arbitration, case evaluation and consulting. I am now blessed with a full-time ADR practice. I have set up my office in the historic Peoples Petroleum Building in Tyler, Texas so that counsel and their clients alike can feel welcome, and at-ease in a non-hostile environment.

I attended the University of Houston Law Center. I was pretty scared and overwhelmed during law school, so I over-studied, and as a result graduated early with highest honors. After graduating, I went to work for a wonderful airline in Dallas, Texas. I worked in Labor Relations for Braniff Airways, Inc. Such an amazing post-graduate experience! I arbitrated labor cases and negotiated collective bargaining contracts. I was instrumental in Braniff hiring its first female pilot and its first male flight attendant. Southwest Airlines had four airplanes at the time. In August, 1974, Braniff was sued in San Antonio, Texas, in what at the time was the largest Title VII nationwide class action ever filed. Braniff referred this case to a little San Antonio law firm. I think they had twelve lawyers.

I soon fell in love with San Antonio, so I joined the Cox, Smith, Smith, Hale and Guenther law firm in March, 1975. I worked mainly on the Braniff case, but also on traditional labor matters for Pearl Brewing, Tesoro Petroleum, Valero, Page Gulfstream, Swearingen Aviation and The Dee Howard Company (I just couldn't get away from the aviation business). I even negotiated a union contract at the Trojan Nuclear Generating Plant in Oregon that became a model for the industry. We were having a ball. Then J. Burleson Smith, my boss and one of the finest people I have ever met, asked me to help him with a bankruptcy case. Well, when the senior partner asks



In re: Commonwealth Oil & Refining Company was the third-largest bankruptcy case ever filed. There were thirty-eight law firms of record. I learned bankruptcy law from the ground up through the school of hard knocks. The first Proof of Claim that I filed was for \$174 million. We resolved the *CORCO* ca

and then the bottom fell out in Texas. In the 1980's, I was suddenly immersed in a nationwide bankruptcy practice representing creditors, trustees, debtors and even at one time the Bankruptcy Court.

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In 1992, I returned to a general litigation practice, with a good deal of employment law mixed in. I did a recall for a client with the National Transportation Safety Board. I negotiated a settlement in a patent matter involving drilling technology. I basically feel that I have done most anything, and I appreciate being given that opportunity by the law firm.

I left the firm in 1997 and began my practice of mediation and arbitration. The year 2009 was the first full year that I had no traditional law client. And so I now have no *agenda* – and I can focus on being truly a *Neutral*. I have been blessed with working with some very fine lawyers and clients on some very significant and diverse (and large) matters. I submit to you that this background places me in a unique position to mediate or arbitrate your dispute.

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EXHIBIT B



Bill Lemons arbitrates and mediates, both domestically and internationally, complex commercial, construction, healthcare, banking, energy, technology, financial services, employment and labor disputes. In addition to being an experienced Neutral on the Large Complex Case, Commercial Dispute, Banking and Financial Services and Employment Law Panels of the American Arbitration Association ("AAA"), he is also a Panelist for the American Health Lawyers Association ("AHLA") ADR Service. He is on the National Panel of the International Centre for Dispute Resolution (the international affiliate of the AAA), and is a Fellow of the Chartered Institute of Arbitrators in London. Bill is also a Fellow of the College of Commercial Arbitrators and a Top Litigator-Related Neutral for the National Academy of Distinguished Neutrals. He has conducted arbitrations under JAMS, AAA, AHLA, ICDR, ICC, IBA and CPR rules. He also conducts many non-administered arbitrations by private agreement or treaty. Bill is recognized as a leader in case management techniques and in the efficient management of conflict resolution processes, and a past Chair of the State Bar of Texas Alternative Dispute Resolution Section. Bill serves, or has served, as a permanent Neutral for Kraft Foods Global, Inc., Coca Cola Refreshments USA, Inc., Southwest Airlines Co., British Airways, Hawaiian Airlines, Toyota U.S.A., Inc. and the Metropolitan Transit Authority of Harris County, Texas.

I don't measure my experience by how many notches I have on my gun – how many arbitrations or mediations I have completed. While I have presided over hundreds of arbitrations, and conducted many more hundreds of mediations, I prefer to measure my experience more by the range of cases in which I have been involved.

I suppose my shortest and maybe smallest arbitration (although it was very important to the parties) was a one-hour hearing between partners of a local law firm. After a short hearing over dinner and a bottle of wine, I decided how they should equitably assess expenses and distribute income from a commercial building they had received from a client. They had not been able to decide how to do that, and simply needed someone fair and objective to make that decision for them. I was flattered.

I have also arbitrated a number of one-day proceedings where neither side had counsel. Typically, these involved a major defense contractor and persons who had been employed by it in Iraq, Latvia, Uzbekistan or other exotic places. The hearing was presented by the employee and the company's human resources official. Often, I conducted these hearings at the local Courthouse, and typically, we take testimony by satellite telephone or videoconferencing.

At the other end of the spectrum, I was on an arbitration panel in a case in Austin, Texas that lasted 28 days and in which 17 lawyers appeared and participated. The evidence filled 16 record-storage boxes. We wrote a \$46 million Award that was paid sixteen days after it was issued. Then there was the three-week hearing on the covenant not-to-compete between the hospital and the physician in Fort Worth. And then there was the international case I chaired, where a Spanish company was very enamored with getting into the toll-road business in Texas, and our decision involved, among other things, placing a monetary value on 3.9 million cubic yards of aggregate. Dirt is not cheap.

As Mediator, I no longer have the luxury of conducting half-day mediations. I have done many – but the success rate is not good. Most of my mediations now are rather complex. I once served as Mediator in a federal case involving 355 plaintiffs and the City of San Antonio. It took 11 ½ months, four meetings and a Mediator's proposal, but it did settle. And then there was the Fair Housing Act mediation where we had seven rooms going and 27 participants. Not to forget the case in West Texas where we (I had Mediator) had over three hundred Plaintiffs and in excess of 40 lawyers. That was fun!

I have successfully mediated cases involving fires, probate matters and wills, trans-gender discrimination, age discrimination, race and sex discrimination, partnership dissolution, lawyer malpractice, fiduciary duty, commercial leases, construction, theme parks and creditor/borrower issues. I once did a bankruptcy case involving bowling balls made in Korea (we conducted it live over the internet, with one of the parties in Soul). Yet, about the time that I feel I have just about heard everything, something else pops up. I regret that I am not trained for and do not do family law/divorce/child custody cases. I much admire those who make peace in that area.

Associations & Professional Activities

Fellow, College of Commercial Arbitrators; Fellow, Chartered Institute of Arbitrators (London); Member, National Panel of Distinguished Neutrals; Member, Association of Attorney-Mediators (Past National Board Member and President); State Bar of Texas (ADR Section, Past Chair); State Bar of Texas Litigation Section; Smith County Bar Association and Bar Foundation (Life Fellow); Credentialed Distinguished Mediator - Texas Mediator Credentialing Association; Certified Professional Mediator - International Mediation Institute (The Netherlands).

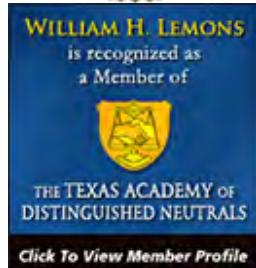
Speaking Engagements

Panel member/presenter at the University of Houston Law Center Program (November, 2011), co-sponsored by AAA, JAMS and CCA, entitled "Managing Your First Arbitration;" Lead facilitator at the national 2010 AAA/ICDR Neutrals Conference (Orlando, November 5-6, 2010) in the program "Arbitrators: Are You What They're Looking For" which introduced the CCA Protocols for Expedited, Cost-Effective Commercial Arbitration. Facilitator at the AAA Neutrals' Program "ADR Strategies That Save Time and Money" (San Antonio, February 26-27, 2010) followed by the AAAU Webinar "How International Arbitration Techniques Can Benefit Domestic Arbitration" (October 15, 2010); Course Director, State Bar of Texas ADR Section and Texas Bar CLE Annual Seminar: "Alternative Dispute Resolution Course" (January 29, 2010).

Education

Bill received a B.B.A. with Emphasis in Personnel Management from the University of Houston in 1970, and a J.D. *Magna Cum Laude* (Top 2%) from the University of Houston Law Center in 1972 (Order of the Coif and Houston Law Review). He completed the Attorney-Mediators Institute Training Program in March, 1997, and since has completed over four hundred hours of Advanced Mediator and Arbitrator training by AAM, TAM, CPR and the AAA. Bill has assisted the AAA as facilitator or trainer in teaching the 40 hour basic mediation skills course to *Coca Cola Enterprises, Inc.*, *Zachry Construction Corporation*, *Alamo Community College District* and others, and has taught the "Arbitration Advocacy" course for the AAA.

[VIEW FULL RESUME \(/UPLOADS/CMS/NAV-27-5F2028881F38E.PDF\)](#)



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William H. Lemons
MEDIATOR • ARBITRATOR

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Tyler, Texas 75702
Phone (210) 313-1663
Bill@WHLemonsADR.com

OVERVIEW

Bill Lemons arbitrates, both domestically and internationally, complex commercial, construction, healthcare, banking, energy, technology, financial services, employment and labor disputes. In addition to being an experienced Arbitrator on the Large Complex Case, Commercial Dispute, Banking and Financial Services and Employment Law Panels of the American Arbitration Association (“AAA”), he is also a Panelist for the American Health Lawyers Association (“AHLA”) ADR Service. He is on the National Panel of the International Centre for Dispute Resolution (the international affiliate of the AAA), and is a Fellow of the Chartered Institute of Arbitrators in London. Bill is a Fellow of the College of Commercial Arbitrators, a Top Litigator-Related Neutral for the National Academy of Distinguished Neutrals and has conducted arbitrations under JAMS, AAA, AHLA, ICDR, ICC, IBA and CPR rules. He also conducts many non-administered arbitrations by private agreement or treaty. Bill is recognized as a leader in case management techniques and in the efficient management of conflict resolution processes, and a past Chair of the State Bar of Texas Alternative Dispute Resolution Section. Bill serves, or has served, as a permanent Neutral for Kraft Foods Global, Inc., Coca Cola Refreshments USA, Inc., Southwest Airlines Co., British Airways, Hawaiian Airlines, Toyota U.S.A., Inc. and Resolute Systems, LLC.

EDUCATION

J.D. *Magna Cum Laude* (Top 2%)
UNIVERSITY OF HOUSTON LAW CENTER
August, 1970 - December, 1972
Order of the Coif; Houston Law Review

B.B.A. – Emphasis in Personnel Management
UNIVERSITY OF HOUSTON (1970)

**PROFESSIONAL
EXPERIENCE**

WILLIAM H. LEMONS, P.C.
Private Practice of Arbitration and Dispute Resolution.
San Antonio, Texas May, 1997 to Present

Now engaged in the full-time practice of arbitrating commercial, construction, healthcare, banking, financial services, employment and labor disputes, Bill has chaired or been wing in international and significant domestic commercial cases involving complex matters and lengthy proceedings pertaining to stock purchase agreements, trusts and fiduciary obligations, partnership dissolutions, refining, offshore drilling technology, environmental, intellectual property, software and technology disputes. He has extensive experience in construction

disputes, ranging from fabricated homes to significant residences to large commercial and investment properties. He recently chaired an ICDR case involving a Spanish corporation that is the third largest construction company in the world. In the healthcare and medical areas, Bill has chaired or been sole arbitrator in numerous cases involving physician/hospital service/employment agreements, physician practice agreements, non-competition and confidentiality agreements, partnership and/or practice group dissolutions, nursing home negligence and standard of care cases, healthcare provider/insurance company payment/billing disputes, and other matters pertaining to the provision of healthcare-related intellectual property/technology disputes. His experience in the banking and financial services areas is extensive, involving secured transactions, mortgages, lender liability, breach of loan commitment allegations, guaranties, violations of the automatic stay and other wrongful foreclosure matters. In the debtor/creditors rights areas, his experience includes bankruptcy jurisdiction, preferences, avoidable transfers, setoff, interpleader, secured and unsecured loans, indenture trustees, farm and ranch/agri-business matters, oil and gas leases and royalty disputes. His knowledge in the area of oil, gas and other minerals includes matters pertaining to leases and disputes between the operator and surface owner, executive rights, royalty, working interests and division orders, competing water rights and suspension of production revenue. He has served as a Chapter 11 Trustee. He is knowledgeable in the areas of class actions, deceptive trade practices, professional fee applications, professional fee disputes, fee forfeiture actions and legal or CPA malpractice litigation. In the employment area, Bill has chaired or been sole neutral in numerous cases (200+) involving statutory employment claims, equal employment opportunity/discrimination/retaliation disputes, collective actions under the Fair Labor Standards Act (“FLSA”), matters involving the Americans with Disabilities Act, the Age Discrimination in Employment Act and the Family Medical Leave Act, among others. Representative past arbitrations include:

- Panel Arbitrator in a significant (\$100+ million) patent infringement dispute concerning negative pressure wound treatment technology;
- Panel Chair in significant dispute over real estate development in a well-known South Texas golf course community;
- Panel Chair in a significant (\$240+ million) ICDR case involving a Spanish corporation and its dispute over the value of assets it acquired in a stock purchase;
- Panel Arbitrator in a significant (\$50+ million) attorney fee dispute concerning contingent attorneys' fees from a \$190 million settlement. *Campbell Harrison & Dagley, L.L.P. v. Hill*, 782 F.3d 240 (5th Cir. 2015);
- Panel Chair in a number of commercial cases involving the enforcement of commercial guaranties by various secured lenders, including one executed by a U.S. Congressman;
- Sole Arbitrator in a number of cases involving physician/hospital service/employment agreements, physician practice agreements, non-competition and confidentiality agreements, partnership and/or practice group dissolutions, nursing home negligence and standard of care cases and healthcare provider/insurance company payment/billing disputes;
- Sole Arbitrator in a number of FINRA and AAA-administered disputes concerning commissions claimed as a result of the trading of blocks of energy on various commodities markets, and involving forfeiture of deferred compensation as a result of alleged breach of fiduciary duties and/or covenants pertaining to confidentiality and prohibiting competition;

- Chair of several Dispute Review Boards, including one established by the construction partners in a \$1.2 billion hospital renovation project;
- Panel Member in a dispute between partners in a Park City Ski Resort development resulting in an adjudication of frustration or purpose and winding down the partnership.
- Chair or sole Arbitrator in a number of class/collective action or individual arbitrations under the Fair Labor Standards Act of 1938, involving over 3,000 employees and liabilities in excess of \$40 million. Extensive experience in clause construction issues, conditional certification, issuance of notices and opt-in consent forms and adjudication of regular rate and overtime claims.
- Sole Arbitrator in a number of arbitrations involving breach of fiduciary duty, non-competition agreements, executive employment agreements and claims under the Employee Retirement Income Security Act (ERISA).

Past mediation opportunities include:

- Settlement of a number (150+) of disputes involving class action or collective action litigation or pre-suit claims for employees in the oilfield services/energy industry, resulting in settlements exceeding \$400+ million for in excess of 41,000 participants;
- Co-Mediator in a multi-party dispute (42 attorneys and 340+ plaintiffs) over royalties and development rights in a West Texas subdivision as pertains to competing mineral rights estates. *Lesley v. Veterans Land Bd. of Texas*, 352 S.W.3d 479 (Tex. 2011);
- Mediator in a number of commercial disputes between institutional lenders and business borrowers in the banking and financial services arenas involving secured transactions, mortgages, lender liability, breach of loan commitment allegations, guaranties, violations of the automatic stay and other wrongful foreclosure matters;
- Mediator in a number of commercial disputes involving refining, offshore drilling technology, environmental, intellectual property, software and technology and copyright and trade dress disputes.

Attorney/Shareholder – Section Head
COX & SMITH (now **DYKEMA COX SMITH**)
San Antonio, Texas May, 1975 to April, 1997

Shareholder with extensive experience in general civil litigation in state, federal and bankruptcy courts representing defendants and plaintiffs, lenders and creditors.

BRANIFF AIRWAYS, INC.
March, 1973 to May, 1975

In-house Labor Relations Counsel - responsibilities included Title VII and employment discrimination litigation, collective bargaining and arbitration relating to approximately 10,600 employees covered by contracts with the Machinists, Teamsters and Pilots Unions.

AWARDS

Recipient – *Judge Frank Evans Award* (2015) bestowed by the State Bar of Texas *Alternative Dispute Resolution Section*.

Recipient – *Steve Brutsche*’ Award (2015) bestowed by the Association of Attorney-Mediators.

Selected to *Best Lawyers in America* (1989 - Present)

Selected to *Who’s Who in American Law* (1994)

Selected to *Who’s Who Legal*, the Official Research Partner of the International Bar Association (www.whoswholegal.com)

Rated "AV – Preeminent" by *Martindale-Hubbell* - Bar Register of Preeminent Lawyers

ARBITRATION MANAGEMENT TRAINING

Recognized as a leader in case management techniques and is widely known for his efficient management of conflict resolution processes. Was lead facilitator at the national 2010 AAA/ICDR Neutrals Conference (Orlando, November 5-6, 2010) in the program "Arbitrators: Are You What They're Looking For?" which introduced the CCA Protocols for Expedited, Cost-Effective Commercial Arbitration. Also facilitated the AAA Neutrals' Program "ADR Strategies That Save Time and Money" (San Antonio, February 26-27, 2010) followed by the AAAU Webinar "How International Arbitration Techniques Can Benefit Domestic Arbitration" (October 15, 2010). Served as a panel member at the University of Houston Law Center Program (November, 2011), co-sponsored by AAA, JAMS and CCA, entitled "Managing Your First Arbitration." Charter member of the *Guided Choice Group*.

DISPUTE RESOLUTION TRAINING

Participant (by invitation) Energy Arbitration: *Resolving Energy Disputes in Times of Crisis* (CIArb - Houston, April, 2017); Delegate (by invitation) Global Pound Conference Series (Austin, January, 2017); Faculty, AAA Webinar, How to Navigate the Arbitrator Disclosure Minefield, 2014; AAA Webinar, Innovative Testimony Techniques for the Arbitration Hearing, 2014; AAA Faculty Managing a Successful Arbitration, 2014; AAA Disclosures, Depositions and Dispositive Motions, 2013; AAA/ICDR Neutrals Conference, 2012; Association of Attorney-Mediators, Annual CLE Program, 2011; College of Commercial Arbitrators Annual Meeting, 2011, 2010; AAA Regaining Speed and Economy in Dispute Resolution, 2011; AAA Webinar, Due Process Dilemmas: How Far to Go in the Name of Fairness, 2011; State Bar of Texas ADR Section and TexasBarCLE Annual Seminar: Alternative Dispute Resolution Course, 2010; Faculty, AAA/ICDR Neutrals Conference, 2010; AAA Webinar, How International Arbitration Techniques Can Benefit Domestic Arbitration, 2010; AAA, Efficient ADR - Saving the Client's Money Through Technology and Common Sense, 2010; AAA Faculty, ADR Strategies That Save Time and Money, 2010; DRBF, Annual Meeting, 2009; AAA Webinar, Arbitrator Boundaries: What are the Limits of Arbitrator Authority?, 2009; AAA/ICDR Neutrals Conference, 2009; ICDR International Symposia in Advanced Case Management Issues, 2009; State Bar of Texas, Arbitration Roundtable, 2010, 2009, 2007; Association of Attorney-Mediators, Mediator's Tips, Tools and Techniques, 2007; CPR/The Chartered Institute, International Arbitration Training, 2006; AAA Dealing With Delay Tactics in Arbitration (ACE004), 2006; Association of Attorney-Mediators, Advanced Mediator Training, 2006; Attended AAA Neutrals Conference, 2005, 2004, 2003; AAA Arbitrator Ethics and

Disclosure (ACE003), 2004; AAA Arbitration Awards: Safeguarding, Deciding & Writing Awards (ACE001), 2003; AAA Pro Se: Managing Cases Involving Self-Represented Parties (ACE002), 2003; AAA Employment Arbitrator II Training: Advanced Case Management Issues, 2002; AAA Arbitrator Update 2001; AAA Commercial Arbitrator Training, 1999; Association of Attorney-Mediators, Advanced Mediator Training, 1999; AAA Neutrals' Retreat, 1998; Attorney-Mediators Institute Basic Mediation Training, 1997.

**ASSOCIATIONS
and
PROFESSIONAL
ACTIVITIES**

Fellow, College of Commercial Arbitrators; Fellow, Chartered Institute of Arbitrators (London); Member, National Panel of Distinguished Neutrals; Member, Association of Attorney-Mediators (Past National Board Member and President); State Bar of Texas (ADR Section, Past Chair); State Bar of Texas Litigation Section; Institute for Responsible Dispute Resolution (Charter Member); San Antonio Bar Association; San Antonio Bankruptcy Bar Association (Past Officer); Bar Association of the Fifth Federal Circuit; Texas Bar Foundation (Fellow); College of the State Bar of Texas; San Antonio Bar Foundation (Fellow); Credentialed Distinguished Mediator - Texas Mediator Credentialing Association; Certified Professional Mediator - International Mediation Institute (The Netherlands).

SPEAKING

Panel member/presenter at the University of Houston Law Center Program (November, 2011), co-sponsored by AAA, JAMS and CCA, entitled "Managing Your First Arbitration" - to emphasize "Reducing Cost and Delay in Arbitration - Introducing the CCA Protocols"; Lead facilitator at the national 2010 AAA/ICDR Neutrals Conference (Orlando, November 5-6, 2010) in the program "Arbitrators: Are You What They're Looking For" which introduced the CCA Protocols for Expedited, Cost-Effective Commercial Arbitration. Facilitator at the AAA Neutrals' Program "ADR Strategies That Save Time and Money" (San Antonio, February 26-27, 2010) followed by the AAAU Webinar "How International Arbitration Techniques Can Benefit Domestic Arbitration" (October 15, 2010); Course Director, State Bar of Texas ADR Section and Texas Bar CLE Annual Seminar: "Alternative Dispute Resolution Course" (January 29, 2010 ? San Antonio); Speaker and Author: State Bar of Texas ADR Section Seminar: Arbitration Roundtable (January-February, 2010, November, 2009, April, 2007); Colloquy: "To Arbitrate or Not to Arbitrate," 2006 Tarrant County Bench Bar Conference, April, 2006; "How to Participate Effectively in Arbitration (National Employment Lawyers Association," 9th Annual Seminar, June, 2005); "Arbitration Advocacy" (TexasBarCLE Webcast, November, 2006); "Arbitration Advocacy for Attorneys: A Guide to Case Preparation & Presentation in Arbitration" (American Arbitration Association, Austin and San Antonio, 2004-2005); "Nuts and Bolts of Arbitration for Lawyers" (South Texas College of Law-Advocacy Skills for Resolving Disputes, October, 2004); Texas Association of Business - 27th Annual Employment Relations Symposium: "Arbitration - An Alternative to Courts and Juries" (July, 2005); National Employment Lawyers Association Ninth Annual Seminar: "How to Participate Effectively in Arbitration" (June, 2005).

Bill is admitted to the State Bar of Texas (1973); U.S. District Courts for the: Northern (1973); Western (1975) and Southern (2001) Districts of Texas; District of Arizona (1991); Western District of Pennsylvania (2016); U.S. Court of Appeals: Fifth (1977) and Eleventh (1981) Circuits; U.S. Supreme Court (1980).

He subscribes to and follows the AAA's and the AHLA's Code of Ethics for Arbitrators in Commercial Disputes, the AAA's Model Standards of Conduct for Mediators, and the Ethical Guidelines for Mediators promulgated by the State Bar of Texas.

References and terms of appointment will be furnished upon written request.